

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
	)	
Requirements for Digital Television	)	ET Docket No. 05-24
Receiving Capability	)	
	)	

To: The Commission

**COMMENTS OF SANYO Fisher Company, a division of Sanyo North  
America Corporation**

SANYO Fisher Company, respectfully files these Comments in support of the Petition for Rulemaking of the Consumer Electronics Association (“CEA”) and the Consumer Electronics Retailers Coalition (“CERC”) requesting that the Commission accelerate to March 1, 2006, its requirement that all television receivers with screen sizes of 25 to 36 inches incorporate DTV tuners; and that it eliminate the July 1, 2005 date for 50 percent of such receivers to include DTV tuners (“CEA-CERC Petition”).<sup>1</sup>

SANYO Fisher Company believes that a grant of the CEA-CERC Petition will advance the DTV transition by expediting delivery of these popular mid-size television receivers equipped with DTV tuners. It also will eliminate the

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<sup>1</sup> See Petition of Consumer Electronics Association (“CEA”) and the Consumer Electronics Retailers Coalition (“CERC”), ET Docket No. 05-24, filed on November 5, 2004. The Commission issued a Notice of Proposed Rulemaking (“NPRM”) on February 14, 2005. See In the Matter of Digital Television Tuner Requirements, Notice of Proposed Rulemaking, ET Docket No. 05-24, FCC 05-17 (rel. Feb. 14, 2005) (“NPRM”).

unintended consequences of the Commission's 50 percent requirements that became apparent in manufacturing and at retail only recently, but which threaten to impede the roll-out of television receivers equipped with DTV tuners.

SANYO Fisher Company agrees with CEA and CERC that accelerating the 100% requirement and repealing the 50% requirement for 25 to 36 inch receivers to incorporate digital tuners better aligns the Commission's policy with market forces and consumer expectations, as fully discussed in the CEA-CERC Petition. In addition, SANYO Fisher Company acknowledges and supports the Commission's intention (and the views of CEA and CERC) that there will be no revisions to the July 1, 2007 date by which all broadcast television receivers include DTV reception capability.<sup>2</sup>

For these reasons and those set forth in the CEA-CERC Petition, SANYO Fisher Company respectfully requests that the Commission grant the CEA-CERC Petition.

Respectfully submitted,

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April 18, 2005

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<sup>2</sup> See NPRM, at 8.